

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 14-66 (RHK/JSM)

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	GOVERNMENT'S RESPONSE
	)	TO MOTION FOR EXTENSION
v.	)	OF PRETRIAL DEADLINES
	)	
(1) CHARLES ELLISON WILLIAMS III,	)	
(2) APRIL FAY LEWIS,	)	
(3) GABRIELLE LEE OLSEN,	)	
(4) KENNETH BRIAN RABENBERG,	)	
(5) PHOUMARA TODD SOK,	)	
	)	
Defendants.	)	

The United States of America, by and through its attorneys, Andrew M. Luger, United States Attorney for the District of Minnesota, and Allen A. Slaughter, Jr., Assistant United States Attorney, hereby responds to Defendant Charles Ellison Williams III's motion and request to extend by at least 21 days the motions filing date, motions response dates, and the motions hearing date. ECF No. 75. The Government concurs with Defendant Williams' motion for the reasons described in his motion, as well as those provided below.

Defendants are charged in a twelve-count indictment, which includes multiple allegations of Title 18 and Title 21 violations. To assuage concerns regarding the need for preliminary information and to facilitate client communications, the Government has prepared and disclosed client-specific materials for each respective defense counsel. Therefore, pursuant to Court order, the Government has already produced to each Defendant initial disclosures related to each of the defendant's respective offense conducts. While there are presently only five defendants in this particular case, disclosures have been atypical, in that they have included voluminous amounts of information as well as

materials regarding previously-indicted matters. Furthermore, Defendant Williams in his motion accurately describes the wide breadth of materials already disclosed to him. Similar volumes have been produced to each defendant.<sup>1</sup>

The Government agrees with Defendant Williams' request for time, to provide defense counsel ample opportunity review materials already disclosed to them. Such additional time may also help avoid certain "boilerplate" or unnecessary volumes of pretrial motion practice, and thereby facilitate the use of judicial resources.

Therefore, the Government respectfully both concurs with and joins Defendant Williams' motion to extend pretrial deadlines by at least 21 days. ECF No. 75.

Respectfully submitted,

Dated: April 8, 2014

ANDREW M. LUGER  
United States Attorney

s/Allen A. Slaughter, Jr.

BY: ALLEN A. SLAUGHTER, JR.  
Assistant U.S. Attorney  
Attorney ID No. 0301668

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<sup>1</sup> Moreover, and depending the circumstances surrounding each defendant, additional materials containing sensitive information that will need court-ordered protection may also be the subject of disclosure. This issue is being addressed separately and with each defense counsel in the near term.